

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

D. GEORGE SWEIGERT

Plaintiff,

vs.

JASON GOODMAN,

Defendant

Case No.: 1:18-cv-08653-VEC-SDA

DEFENDANT'S DOCUMENT REQUESTS

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1. Please produce all emails sent or received by Plaintiff (from any email address) that mentions or refers to Jason Goodman or Crowdsourcethe Truth.
2. Please produce all documents that are to be used to calculate money earned by Plaintiff as a Cyber Security consultant or ethical hacker each year since 2017.
3. Please identify (by case name, number, and court) each and every lawsuit or arbitration that Plaintiff has been a party to since 2017.
4. Please identify all cell phones (by phone number) that Plaintiff uses to communicate with any person from June 2017 up to the present day.
5. Please provide all documents from the period from June 14, 2015 to the present related to or including communications between the Plaintiff and George Webb.
6. Please provide all documents from the period from June 14, 2015 to the present related to or including communications between the Plaintiff and Manuel Chavez.
7. Please provide all documents from the period from June 14, 2015 to the present related to or including communications between the Plaintiff and Robert David Steele.

- 1 8. Please provide all documents from the period from June 14, 2015 to the present related to
2 or including communications between the Plaintiff and Mari Rapp.
- 3 9. Please provide all documents from the period from June 14, 2015 to the present related to
4 or including communications between the Plaintiff and Jackie Weaver.
- 5 10. Please provide all documents from the period from June 14, 2015 to the present related to
6 or including communications between the Plaintiff and Steve Outtrim.
- 7 11. Please provide all documents from the period from June 14, 2015 to the present related to
8 or including communications between the Plaintiff and Dean Fougere.
- 9 12. Please provide all documents from the period from June 14, 2015 to the present related to
10 or including communications between the Plaintiff and Nathan Stolpman.
- 11 13. Please provide all documents from the period from June 14, 2015 to the present related to
12 or including communications between the Plaintiff and Tyroan Simpson.
- 13 14. Please provide all documents from the period from June 14, 2015 to the present related to
14 or including communications between the Plaintiff and Susan Holmes.
- 15 15. Please provide all documents from the period from June 14, 2015 to the present related to
16 or including communications between the Plaintiff and Marcus Conte.
- 17 16. Please provide all documents from the period from June 14, 2015 to the present related to
18 including communications between the Plaintiff and Quinn Michaels.
- 19 17. Please provide all documents from the period from June 14, 2015 to the present related to
20 or including communications between the Plaintiff and law enforcement or government
21 agencies regarding Defendant.
- 22 18. Please provide all documents from the period from June 14, 2015 to the present related to
23 or including information regarded Plaintiff's social media posts on YouTube, Twitter,
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SDNY.ORG or other social media sites pertaining to Jason Goodman or Crowdsorce the Truth including videos that have been deleted or otherwise made inaccessible.

19. Please provide all documents from the period from June 14, 2015 to the present related to or including communications between Plaintiff and YouTube with regard to Defendant.

20. Please provide all documents from the period from June 14, 2015 to the present related to or including communications between Plaintiff and Patreon with regard to Defendant.

21. Please provide all documents from the period from June 14, 2015 to the present related to or including communications between Plaintiff and SubscribeStar with regard to Defendant.

22. Please provide all documents from the period from June 14, 2015 to the present related to or including communications between Plaintiff and any member of the Television Academies, including their associates, affiliates and representatives pertaining to the Defendant, Crowdsorce the Truth or the broadcast of June 12, 2020 (CRONY Awards) which is the subject of controversy in NATAS v Multimedia (1:20-cv-07269-VEC)

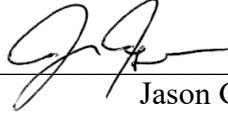
23. Please provide all documents from the period from June 14, 2015 to the present between Plaintiff and Amazon.com including its agents regarding the publication and sales of books authored by Plaintiff that have been sold on Amazon.com and referenced in these proceedings.

24. Please produce all documents Plaintiff intends to rely upon to prove claims of damages.

1 I hereby attest that the pleadings herein are accurate and true under penalties of perjury.

2 Signed this 7th day of February 2021

3 Respectfully submitted,

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5 Jason Goodman, Defendant, Pro Se

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